

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re: :
: **Case No.: 17-50236**
Louis Anthony Telerico : **Chapter 7**
: **Judge Alan M. Koschik**
Debtor(s). : *********
: *********
: *********
:

**RESPONSE TO MOTION TO SURCHARGE BANK OF AMERICA, N.A.'S
COLLATERAL (DOCKET # 236)**

Now comes Bank of America, N.A. ("Creditor") by and through its attorneys, Manley Deas Kochalski LLC, and responds to the Motion to Surcharge Bank of America, N.A.'s Collateral filed by Louis Anthony Telerico ("Debtor") on April 9, 2019 at Docket # 236.

Creditor states that Debtor has not cited any legal authority that would allow Creditor to be surcharged. Furthermore, Bank of America only holds a lien interest in the property located at 545 Bristol Drive, Aurora, Ohio 44202 (the "Property"), not an ownership interest.

WHEREFORE, Creditor respectfully requests that a hearing be set on the matter and that the motion be denied.

Respectfully submitted,

/s/ Adam B. Hall
Stephen R. Franks (0075345)
Edward H. Cahill (0088985)
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The case attorney for this file is Stephen R.
Franks.
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CERTIFICATE OF SERVICE

This is to certify that on June 28, 2019, a true and accurate copy of the foregoing Response to Motion to Surcharge Bank of America, N.A.'s Collateral was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Office of U.S. Trustee, Northern District of Ohio, Party of Interest, (Registered address)@usdoj.gov

Kathryn A Belfance, Chapter 7 Trustee, kb@rlblp.com

Susan J. Lax, Attorney for Louis Anthony Telerico, susan.lax@hotmail.com

Frederic P. Schwieg, Attorney for Louis Anthony Telerico, fschwieg@schwieglaw.com

and on the below listed parties by regular U.S. mail, postage prepaid:

Louis Anthony Telerico, PO Box 928, Aurora, OH 44202

Louis Anthony Telerico, 545 Bristol Drive, Aurora, OH 44202

Portage County Treasurer, 449 South Meridian Street , Ravenna , OH 44266

Internal Revenue Service, PO Box 7346, Philadelphia, PA 19101-5016

Ohio Department of Taxation, Attn Bankruptcy Division, PO Box 530, Columbus, OH 43216-0530

Portage County Treasurer, 449 S Meridian St FL1, Ravenna, OH 44266-1217

Stifel Bank and Trust, 955 Executive Pkwy Ste 216, Saint Louis, MO 63141

/s/ Adam B. Hall

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